

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND

In re:)
)
NAHID AHMADPOUR)
) Case No. 18-11248
) Chapter 7
)
)
_____)

APPLICATION UNDER FED. R. BANKR. P. 9006(c)(1)
FOR ORDER SHORTENING TIME PERIOD FOR NOTICE

COMES NOW Nationwide Registry & Security, Ltd., (“NRS”), by counsel, and requests that this Court shorten the time for hearing on its Emergency Motion to Lift the Stay and For Fees, and authorize the hearing to be conducted on **February 8, 2018 at 10:00 a.m.**, and in support thereof, states as follows:

1. NRS is a creditor of the Debtor, Nahid Ahmadpour (“Ahmadpour”), having obtained a judgment against her on January 17, 2008, in the Fairfax Circuit Court in the principal sum of \$80,000, plus interest, and attorney’s fees of \$16,000. The judgment was based upon a series of ten (10) bad checks written by Ahmadpour. Those checks were among \$268,150 in bad checks written by Ahmadpour during the month of October 2005. Ahmadpour was criminally charged for her actions and plead guilty to passing bad checks with the intent to defraud.

2. Since the entry of that judgment, Ahmadpour and her husband, Youri Beitdashtoo, have engaged upon a course of action utilizing the bankruptcy court in an effort to avoid collection of the judgment. As of the current filing, Ahmadpour and her husband have filed a total of **seven (7) bankruptcy cases**; four (4) in Virginia, two (2) in the District of Columbia, and now this seventh case in Maryland. The history of those prior cases and the Debtor’s efforts to avoid collection are detailed in NRS’s Emergency Motion to Lift Stay.

3. The reason Ahmadpour filed this 7th action was to avoid a hearing and trial in a case that has been pending in the Circuit Court of Fairfax County since 2010, Case No. 2010-15001. That action seeks to set aside Ahmadpour's transfer of her solely owned residence in Virginia into the names of herself and her husband, which transfer was made in fraud of creditors and with the intent to try and put the residence out of the reach of Ahmadpour's individual creditors. The various bankruptcy filings of Ahmadpour and her husband have literally prevented that case from going to trial for more than **seven (7) years**.

4. Specifically, the current 7th bankruptcy filing was to avoid the following two upcoming state court hearings:

(i) **February 9, 2018** seeking sanctions against Ahmadpour based upon her failure to appear at her duly noticed deposition;

(ii) **February 12, 2018** trial.

5. The debt owed to NRS cannot be discharged; Ahmadpour already attempted that in her 2008 Chapter 7 filing in Virginia.

6. Debtor claims the real estate which is the subject of the state court action is in joint names and thus is not an asset of the Bankruptcy Estate. Debtor further claims that the property is exempt.

7. Contrary to Debtor's Schedules, the mortgages on the real property are solely in the name of her Husband. Accordingly, there are no joint debts per Debtor's schedules, and thus since Debtor claims the real property is jointly titled, it cannot be administered by the Trustee for the benefit of Ahmadpour's creditors.

8. There is no purpose to the bankruptcy hearing other than to delay the Fairfax Circuit Court proceedings.

9. If the time for hearing on the lift stay motion of NRS is not shortened, Ahmadpour will have once again improperly used the bankruptcy court process not for what it was intended—a fresh start for deserving debtors—but as a weapon to further delay a state court proceeding which has been pending almost more than seven years.

10. Reduction of the time period in question is not prohibited under Fed. R. Bankr. P. 9006 (c)(2) and the rules listed therein.

WHEREFORE, Nationwide Registry & Security, Ltd., by counsel, prays for the entry of the order submitted herewith, shortening the time and scheduling a hearing on the Emergency Motion for Lift Stay for **February 8, 2018 at 10:00 a.m.**

Nationwide Registry & Security, Ltd.
By Counsel

O'CONNOR & VAUGHN LLC
Robert L. Vaughn, Jr., VSB # 20633
11490 Commerce Park Drive, Suite 510
Reston, Virginia 20191
(703) 689-2100 Telephone
(703) 471-6496 Facsimile
Email: rvaughn@oconnorandvaughn.com

By /s/ Robert L. Vaughn, Jr.
Robert L. Vaughn, Jr.
Counsel for NRS

LAW OFFICES OF LEWIS AND ASSOCIATES, PC
6066 Leesburg Pike, Fourth Floor
Falls Church, VA 22041
(703) 912-3100

By /s/ Fitzgerald Lewis
Fitzgerald Lewis
Co-counsel for Plaintiff

Certificate of Service

I hereby certify that on February 5, 2018, I caused the foregoing Motion to Shorten Time to be served on the U.S. Trustee, the Chapter 7 Trustee (if one has been appointed), and Debtor's counsel by CM/ECF. Counsel also emailed a copy of this Motion directly to Debtor's counsel.

/s/ Robert L. Vaughn, Jr.
Robert L. Vaughn, Jr.